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Via ECF

June 8, 2018

Honorable Loretta A. Preska
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Chuck Connors Person, et. al., 17 Cr. 683 (LAP)

Dear Judge Preska:

We respectfully submit this letter to ask the Court – with no objection from the government – to modify the bail conditions of our client Rashan Michel.

Mr. Michel faces charges for alleged bribery offenses relating to his alleged role in a scheme to provide funds to an assistant college basketball coach in return for having college players referred to him and another person (actually a government cooperating witness) for business purposes upon their entry into the NBA.

Mr. Michel is currently at liberty on a \$100,000 personal recognizance bond, signed by two co-signors. The current terms of his bail require him to surrender any passport and restrict his travel to the Southern and Eastern Districts of New York, the Middle District of Alabama, the Western District of North Carolina, and the Northern District of Georgia. His current terms also permit him to travel to Birmingham, Alabama, New Orleans, Louisiana, and Washington DC, with at least 48 hours' notice.

The one modification we seek is that he be allowed to travel throughout the continental United States, on the condition that he provides his pre-trial officer with 48 hours' advance notice of any travel plans. Mr. Michel conducts a clothing business that requires him to travel and personally promote his products in meetings with clients, and he markets his products nationwide. The publicity from the instant case has created some business challenges for him and underscored the need for his ability to travel.

Mr. Michel has made all of his court appearances without issue and is working closely with defense counsel. We respectfully submit that he poses no risk of flight and is not a danger to the community. The wire fraud charge, set forth in the original indictment, is no longer being pursued against him.

Assistant United States Attorney Robert Boone has authorized me to represent to the Court that the government has no objection to this request.

Respectfully,

/s/ Jonathan Bach

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